

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

WENDY GAUTHIER,

Plaintiff

v.

SUNHEALTH SPECIALTY
SERVICES, INC. and SUNBRIDGE
HEALTHCARE CORPORATION,

Defendants

CIVIL ACTION NO.: 05cv40119-FDS

JOINT STATEMENT AND PROPOSED PRETRIAL SCHEDULE

1. **Initial Disclosures:** Initial disclosures required by Fed.R.Civ.P. 26(a)(1) must be completed by February 10, 2006.
2. **Amendments to Pleadings:** Except for good cause shown, no motions seeking leave to add new parties or to amend the pleadings to assert new claims or defenses may be filed after May 1, 2006.
3. **Fact Discovery-Interim Deadlines:**
 - a. All requests for production of documents and interrogatories must be served by March 13, 2006;
 - b. All requests for admission must be served by March 13, 2006;
 - c. All depositions, other than expert depositions, must be completed by June 15, 2006.
4. **Fact Discovery-Final Deadlines:** All discovery, other than expert discovery must be completed by June 15, 2006.
5. **Status Conference:** A status conference will be held on June 30, 2006.
6. **Expert Discovery:**
 - a. Plaintiff's trial experts must be designated, and the information contemplated by Fed.R.Civ.P. 26 (a)(2) must be disclosed by July 31, 2006.

- b. Plaintiff's trial experts must be deposed by August 15, 2006.
- c. Defendants' trial experts must be designated, and the information contemplated by Fed.R.Civ.P. 26 (a)(2) must be disclosed by August 30, 2006.
- d. Defendants' trial experts must be deposed by September 15, 2006.

7. Dispositive Motions:

- a. Dispositive motions, such as motions for summary judgment or partial summary judgment and motions for judgment on the pleadings, must be filed by September 29, 2006.
- b. Oppositions to dispositive motions must be filed within 25 days after service of the motion.

8. Pretrial Conference: A pretrial conference will be held on October 20, 2006 at 10:00 a.m.

9. Consent to Magistrate Judge: Neither Party Consents to a Magistrate Judge.

Respectfully submitted,

The Plaintiff
WENDY GAUTHIER
By Her Attorney

The Defendant
SUNHEALTH SPECIALTY
SERVICES, INC. and SUNBRIDGE
HEALTHCARE CORPORATION
By Their Attorney

Lawson & Weitzen, LLP

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Dated: January 3, 2006